

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In Re:	:	Case No. 14-20133-CMB
	:	
Scott A. Prentice	:	Chapter 13
Paula M. Prentice	:	
<i>Debtors</i>	:	Related to Claim No. 10
*****	:	
Nationstar Mortgage LLC	:	
<i>Movant</i>	:	
	:	
-VS-	:	
	:	
Scott A. Prentice	:	
Paula M. Prentice	:	
Ronda J. Winnecour Esq., Trustee	:	
<i>Respondents</i>	:	

DECLARATION REGARDING NOTICE OF MORTGAGE PAYMENT CHANGE

AND NOW, comes the Respondents, Scott A. Prentice and Paula M. Prentice, by and through counsel, Robert J. Taylor and files the within Declaration regarding the Notice of Mortgage Payment filed at Claim No. 10 on May 31, 2019 and states as follows:

1. On or about May 31, 2019 the Movant filed a Notice of Mortgage Payment Change, at Claim No. 10 requesting that the new monthly mortgage payment be \$697.37 on 7/1/2019 due to an alleged *Escrow Adjustment* (See Claim No. 10).

2. Debtors' Chapter 13 Plan is completed and The Chapter 13 Trustee instructed debtor's to resume mortgage payments by correspondence from The Chapter 13 Trustee on or about March 8, 2019.
3. As the Chapter 13 Plan and Trustee are no longer making payments, this Declaration follows.
4. Undersigned will mail a copy of the Notice of Mortgage Payment Change to Debtors so they are aware the new total payment amount of \$697.37
5. Undersigned would formally request, that since The Chapter 13 Plan is completed, the movant immediately begin sending mortgage statements to the debtor.

WHEREFORE, it is the position of the debtor that this declaration that no Amended Chapter 13 be filed due to the fact that the Chapter 13 Trustee has ceased making payments in this case.

Respectfully Submitted,

/s/ Robert J. Taylor
Robert J .Taylor, Esq. PA ID 05268
337 Merchant Street
Ambridge, PA 15003
Email: rjt52@hotmail.com
724-266-2370
Attorney For Debtors

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Paula M. Prentice :
 Debtors : Related to Claim No. 10
***** :
Nationstar Mortgage LLC :
 Movant :
:
-vs- :
:
Scott A. Prentice :
Paula M. Prentice :
Ronda J. Winnecour Esq., Trustee :
 Respondents :

**CERTIFICATE OF SERVICE OF DECLARATION REGARDING NOTICE OF MORTGAGE
PAYMENT CHANGE [DOC.87]**

I, Robert J. Taylor, Esq., hereby certify under penalty of perjury, that I served a true and correct copy of the **DECLARATION REGARDING NOTICE OF MORTGAGE PAYMENT CHANGE [Doc. 87]** on the following list of interested parties on June 10, 2019:

Karina Velter
Manley Deas Kochalski LLC
P.O. Box 165028
Columbus, OH 43216-5028

Scott A. Prentice
422 Elm Road
Ambridge, PA 15003

Paula M. Prentice
422 Elm Road
Ambridge, PA 15003

Ronda J. Winnecour, Esquire
Chapter 13 Trustee
Suite 3250, USX Tower
600 Grant Street
Pittsburgh, PA 15219

Office of the United States Trustee
Liberty Center
1001 Liberty Avenue, Suite 970
Pittsburgh, PA 15222

Date Executed: June 10, 2019

/s/ Robert J. Taylor

Robert J. Taylor, Esq.
337 Merchant Street
Ambridge, PA 15003
Phone: 724-266-2370

Email: rjt52@hotmail.com

PA ID 05268